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Specialized Loan Servicing, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TROY A. GARCIA,

Plaintiff,

v.

SPECIALIZED LOAN SERVICING LLC;
AMERICAN HONDA FINANCE CORP.;
TOYOTA FINANCIAL SERVICES; WELLS
FARGO CARD SERVICES; EQUIFAX
INFORMATION SERVICES, LLC,

Defendants.

Case No.: 2:17-cv-01721-RFB-VCF

**STIPULATION FOR EXTENSION OF
TIME**

THIRD REQUEST

Pursuant to LR 6-1 and LR 26-4, Plaintiff Troy A. Garcia ("Plaintiff"), and Defendant Specialized Loan Servicing, LLC ("SLS"), by and through their respective counsel of record, hereby stipulate and request that this Court extend the dispositive motion deadline by ten (10) days. At this time, the parties are not seeking an extension of any other discovery deadlines but reserve the right to request in the future. In support of this Stipulation and Request, the parties state as follows:

A. DISCOVERY COMPLETED TO DATE

Presently, the active parties to this case are Plaintiff and Specialized Loan Servicing, LLC ("SLS"), and as such, the recitation of discovery shall be with respect to Plaintiff and SLS.

On October 6, 2017 Plaintiff served his initial disclosures;

On October 27, 2017 SLS served its initial disclosures;

On November 17, 2017 Plaintiff served his First Supplemental Disclosures;

On January 30, 2018 SLS served Request for Admissions, Request for Production of Documents and Interrogatories on Plaintiff;

On January 31, 2018 Plaintiff served Request for Admissions, Request for Production and Interrogatories of Documents on SLS;

On March 1, 2018 SLS served responses to Request for Admissions, Request for Production of Documents and Interrogatories, and Supplemental Disclosures;

On March 5, 2018 Plaintiff served responses to Request for Admissions, Request for Production of Documents and Interrogatories and Second and Third Supplemental Disclosures.

On March, 5, 2018 Plaintiff completed the 30(b)(6) deposition of SLS.

On March 9, 2018 SLS completed the deposition of Plaintiff.

Specific Description of Discovery that Remains to be Completed

1. No additional discovery is needed. However, the parties did not receive all transcripts from the depositions completed in early March 2018 until late March 2018 and the deadline for deponents to note any revisions to their depositions has not expired, preventing preparation of dispositive motions. Additionally, a motion to dismiss Plaintiff's complaint remains pending before the Court.

C. Reasons Why the Remaining Discovery Was Not Completed

The parties aver, pursuant to LR 6-1 and LR 26-4, that good cause exists for the requested extension. At this juncture, discovery has closed in this matter. The parties previously stipulated to extend pretrial deadlines to allow the completion of discovery. While the parties had originally expected to file dispositive motions by the present deadline, scheduling conflicts and personal emergencies have delayed preparation of said motions. The requested extension of the dispositive motion deadline is to permit the parties to prepare appropriate dispositive motions. The parties are bringing this request now because they did not know at least twenty-one (21) days prior to the pending dispositive motion deadline that such complications would arise.

In order to have the necessary time to prepare appropriate dispositive motions, the parties request a ten (10) day extension of the dispositive motion deadline. This is their third request to extend the deadline to file dispositive motions.

D. Proposed Discovery Deadlines

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Close of Discovery	Expired	Same
Deadline to Amend Pleadings	Expired	Same
Deadline to Disclose Initial Experts	Expired	Same
Deadline to Disclose Rebuttal Experts	Expired	Same
Dispositive Motions	May 4, 2018	May 14, 2018
Pre-Trial Order	June 4, 2018	June 14, 2018

/// If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

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1 **IT IS SO STIPULATED.**

2 DATED this 1st day of May, 2018.

 DATED this 1st day of May, 2018

3 GREENBERG TRAURIG, LLP

 KNEPPER & CLARK LLC

4
5 /s/ Michael Hogue

/s/ Miles N. Clark

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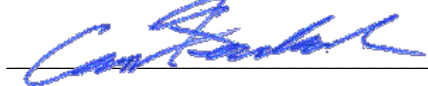
 Henderson, NV 89123

Counsel for Plaintiff Troy A. Garcia

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15 **SCHEDULING ORDER**

16 The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this
17 action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

18 IT IS SO ORDERED

19 

20 United States Magistrate Judge

21 Dated: 5-1-2018

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), 45, I hereby certify that on May 1, 2018, a copy of the foregoing **STIPULATION FOR EXTENSION OF TIME (THIRD REQUEST)** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's CM/ECF filing system, and parties may access this filing through the Court's CM/ECF system.

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